

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

----- X
In re :
 :
 :
 THE FINANCIAL OVERSIGHT AND :
 MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA
 : Title III
 as representative of : Case No. 17-BK-3283 (LTS)
 : (Jointly Administered)
 THE COMMONWEALTH OF PUERTO RICO *et al.*, :
 :
 Debtors.¹ :
----- X
 THE OFFICIAL COMMITTEE OF UNSECURED :
 CREDITORS OF THE COMMONWEALTH OF :
 PUERTO RICO, :
 :
 as agent of :
 :
 THE FINANCIAL OVERSIGHT AND :
 MANAGEMENT BOARD FOR PUERTO RICO :
 :
 as representative of : Adv. Proc. No. 17-00257-LTS
 THE COMMONWEALTH OF PUERTO RICO, :
 :
 Plaintiff, :
 :
 v. :
 :
 BETTINA WHYTE, :
 :
 as agent of :
 :
 THE FINANCIAL OVERSIGHT AND :
 MANAGEMENT BOARD FOR PUERTO RICO :
 :

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

as representative of
THE PUERTO RICO SALES TAX FINANCING
CORPORATION,
Defendant.
----- X

**INFORMATIVE MOTION OF BETTINA M. WHYTE, IN HER CAPACITY
AS AGENT FOR THE PUERTO RICO SALES TAX FINANCING CORPORATION
(COFINA), REGARDING APPEARANCE AT THE DECEMBER 20, 2017 HEARING**

Pursuant to the Court’s *Order Regarding the Location and Procedures for Attendance, Participation and Observation of the December 20-21, 2017 Omnibus Hearing* [Docket No. 1893] and *Order Scheduling Briefing Deadlines in Connection with Scope Motion Practice in the Commonwealth-COFINA Dispute* [Adv. Proc. Dkt. No. 117] (the “Scope Motion Scheduling Order”), Bettina M. Whyte, in her capacity as the Court-appointed representative (“COFINA Agent”) for COFINA² in the Commonwealth-COFINA Dispute, respectfully notifies the Court of her intent to present argument at the hearing to be held by the Court on December 20-21, 2017. The COFINA Agent will be represented by Matthew A. Feldman and Antonio Yanez, Jr. from Willkie Farr & Gallagher LLP and Kenneth N. Klee from Klee, Tuchin, Bogdanoff & Stern LLP, who will appear at the United States District Court for the Southern District of New York. In compliance with Local Civil Rule for the U.S. District Court for the District of Puerto Rico 83-A(f), local counsel for the COFINA Agent, Nilda M. Navarro-Cabrera, will attend the hearing at the United States District Court for the District of Puerto Rico. Mr. Yanez will present the argument on behalf of the COFINA Agent with regard to the Scope Motions (as defined in the Scope Motion Scheduling Order).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the *Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA Dispute* [Docket No. 996].

Dated: December 15, 2017
New York, New York

Respectfully submitted,

By: /s/ Nilda M. Navarro-Cabrer
Nilda M. Navarro-Cabrer
(USDC – PR No. 201212)
**NAVARRO-CABRER LAW
OFFICES**
El Centro I, Suite 206
500 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918
Telephone: (787) 764-9595
Facsimile: (787) 765-7575
Email: navarro@navarrolawpr.com
Local Counsel to the COFINA Agent

Kenneth N. Klee (*pro hac vice*)
Daniel J. Bussel (*pro hac vice*)
Jonathan M. Weiss (*pro hac vice*)
**KLEE, TUCHIN, BOGDANOFF &
STERN LLP**
1999 Avenue of the Stars, 39th Floor
Los Angeles, California 90067
Telephone: (310) 407-4000
Facsimile: (310) 407-9090
Email: kklee@ktbslaw.com
dbussel@ktbslaw.com
jweiss@ktbslaw.com

*Special Municipal Bankruptcy
Counsel to the COFINA Agent*

Respectfully submitted,

By: /s/ Antonio Yanez, Jr.
Matthew A. Feldman (*pro hac vice*)
Joseph G. Minias (*pro hac vice*)
Antonio Yanez, Jr. (*pro hac vice*)
Martin L. Seidel (*pro hac vice*)
James C. Dugan (*pro hac vice*)
Paul V. Shalhoub (*pro hac vice*)
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
Email: mfeldman@willkie.com
jminias@willkie.com
ayanez@willkie.com
mseidel@willkie.com
jdugan@willkie.com
pshalhoub@willkie.com

Counsel to the COFINA Agent